

Menstrual Products Purchasing Specification

Response to Comments

The GreenNY procurement subcommittee received supportive comments from six different entities, including one entity offering full support with one addition.

The comments were received from nonprofit stakeholders including Healthy Schools Network, Clean and Healthy NY, The Sierra Club Atlantic Chapter, and Women's Voices for the Earth. Comments were also received by manufacturers of menstrual products, including Natracare and Seventh Generation.

Seventh Generation offered the following statement in their comments:

"On behalf of Seventh Generation, thank you for this opportunity to testify in support of the proposed Specifications for Menstrual Products with one addition:

The specification for pads and tampons should allow for the use of wood pulp (TCF or unbleached) in regular, maxi, and overnight pads as cotton may not be sufficient for absorbing heavier flows. In addition, we would support the inclusion of fragrance ingredients in the list of ingredients, especially of identified fragrance allergens. Finally, the use of PFAS, as defined, should not be allowed in menstrual products or packaging."

Response #1

We will add in definitions for Elemental Chlorine Free (ECF) and Totally Chlorine Free (TCF).

We will be incorporating wood pulp into the final specification. This is because less than a third of the market can meet the 100% cotton requirement for pads. When cotton is present in a pad, it is normally found in the top layer, and wood pulp (cellulose) or foam often comprises the core layer. This Wood Pulp (cellulose) ingredient will be specified to be carbon disulfide-free and rayon-free* and TCF. We will split the specifications for pads and tampons into individual sections to allow for wood pulp for *pads only*. It is important for the top layer to be 100% cotton since wood pulp can be a source of irritation for some individuals.

Tampons are largely available in 100% certified organic cotton varieties.

*Please see additional notes below from Women's Voices for the Earth regarding carbon disulfide and rayon:

1. Wood Pulp is the raw component of rayon, which is commonly found in commercial pads and tampons. In 2018, Women's Voices for the Earth commissioned independent testing of menstrual products sold in New York. Carbon disulfide is the chemical they detected most frequently. Carbon disulfide is a chemical commonly used in the

production of rayon. Their results detected carbon disulfide emissions from all four tampons that contain rayon, but it was not detected in either of the all-cotton tampons. Exposure to carbon disulfide among female workers in rayon manufacturing plants has been associated with increased risk of menstrual disorders, early menopause, and hormonal disturbances. Other studies of rayon workers have linked both adverse cardiovascular and neurological impacts with carbon disulfide exposure.

2. There were other chemicals of concern found in tampons containing rayon, including methylene chloride, methyl ethyl ketone, ethyl acetate, m,p-xylene, heptane, hexane, toluene. These chemicals could be coming from fragrance, another undisclosed additive, or possibly as contaminants of the tampon manufacturing process. More research is needed to better understand the sources and potential impacts of exposures to these chemicals from tampon use.

Response #2

We will add a definition of the word “Fragrance” for clarity.

Fragrance can be particularly irritating for individuals who menstruate that are sensitive to them, particularly to potential fragrance allergens. Fragrance can be derived from either synthetic or natural raw materials, or a combination of the two. Fragrance in products may be potential sources of toxicants and/or allergens. Scented menstrual products may contain toxic chemicals and/or fragrance allergens that could potentially pose unnecessary health risks to consumers and the environment. For purposes of this specification, we will treat “Fragrance” as a single class and continue to specify “Fragrance free” for all products for the following reasons:

1. Refer to point #2 as listed above.
2. Approximately 80% - 90% of commercial fragrances are comprised of synthetic raw materials.
3. Numerous fragrance ingredients, even those which are natural compounds found in lavender oil and lemon oil, for example, can lead to allergies in sensitive persons. Exposure to allergens in fragrance through inhalation or absorption through the skin can cause skin and eye irritation, as well as more serious impacts such as breathing problems.
4. Synthetic musk’s are often found in personal care products, like pads and tampons. They are designer industry chemicals produced to replicate musk scents originally obtained from musk deer and musk ox. Commonly used synthetic musk’s are the polycyclic musk’s, galaxolide and tonalide, and two types of nitro musk’s, musk xylene and musk ketone. Research indicates that synthetic musk’s are persistent, bioaccumulative, potential hormone disruptors and may break down the body’s defenses against other toxic chemical exposure.
5. Phthalates are a class of chemicals used in fragrance that do not contribute a scent, but rather act as solvents and carriers for those chemicals that create the scent in a

fragrance. Phthalates have been shown to cause reproductive and developmental harm in laboratory animals and are linked to similar impacts in humans.

6. Products on shelves have unknown chemical combinations that are simply listed as “Fragrance” on ingredient lists. Fragrance provides no useful benefit to the Form, Function and Utility of menstrual products, and may be more harmful than beneficial both to consumers and the environment.
7. There are no existing laws in NYS requiring a complete list of fragrance ingredients that need to be disclosed on packaging, including those that are and are not protected by CBI.
8. Due to the lack of disclosure surrounding fragrance, and the variety of unknowns associated with fragrance ingredients, it would not be feasible at this time for New York State to promulgate a list of acceptable fragrance ingredients.
9. Fragrance-free menstrual products are largely available on the market.